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Attorneys for Defendant/Third-Party  
Plaintiff Commonwealth Land Title Insurance Company  
DK-4593 (David R. Kott, Esq.)

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

WALSH SECURITIES, INC.,

v. Plaintiff,

CRISTO PROPERTY MANAGEMENT, LTD.,  
a/k/a G.J.L. LIMITED, DEK HOMES OF  
NEW JERSEY, INC., OAKWOOD  
PROPERTIES INC., NATIONAL HOME  
FUNDING, INC., CAPITAL ASSETS  
PROPERTY MANAGEMENT & INVESTMENT  
CO., INC., CAPITAL ASSETS  
PROPERTY MANAGEMENT, L.L.C.,  
WILLIAM J. KANE, GARY GRIESER,  
ROBERT SKOWRENSKI, II, RICHARD  
CALANNI, RICHARD DIBENEDETTO, JAMES  
R. BROWN, THOMAS BRODO, RONALD J.  
PIERSON, STANLEY YACKER, ESQ.,  
MICHAEL ALFIERI, ESQ., RICHARD  
PEPSNY, ESQ., ANTHONY M. CICALESE,  
ESQ., LAWRENCE M. CUZZI, ANTHONY  
D'APOLITO, DAP CONSULTING, INC.,  
COMMONWEALTH LAND TITLE INSURANCE  
COMPANY, NATIONS TITLE INSURANCE  
OF NEW YORK INC., FIDELITY NATIONAL  
TITLE INSURANCE COMPANY OF NEW YORK,  
COASTAL TITLE AGENCY, and  
STEWART TITLE GUARANTY COMPANY,  
IRENE DiFEO, DONNA PEPSNY,  
WEICHERT REALTORS, AND VECCHIO  
REALTY, INC. D/B/A MURPHY REALTY  
BETTER HOMES and GARDENS,

Defendants.

and

COMMONWEALTH LAND TITLE INSURANCE  
COMPANY,

Defendant/Third Party Plaintiff,

v.

ROBERT WALSH and ELIZABETH ANN  
DeMOLA,

Third Party Defendants.

Civil Action No. 97-3496  
Honorable William G. Bassler

NOTICE TO TAKE ORAL DEPOSITION  
OF PLAINTIFF WALSH SECURITIES,  
INC.

TO: Robert A. Magnanini, Esq.  
Boies, Schiller & Flexner LLP  
150 John F. Kennedy Parkway  
Short Hills, NJ 07078  
Attorneys for plaintiff Walsh Securities, Inc.

SIR:

**PLEASE TAKE NOTICE** that on Friday, April 18, 2008, at 9:30 A.M. in the forenoon, the undersigned pursuant to Federal Rule of Civil Procedure 30(b)(6) shall take the deposition upon oral examination before an officer duly authorized to administer oaths in the State of New Jersey at the office of Robert A. Magnanini, Esq., Boies, Schiller & Flexner LLP, 150 John F. Kennedy Parkway, Short Hills, NJ 07078 of the following persons:

1. The officer(s), director(s), managing agent(s) or other person who consents to testify on behalf of plaintiff Walsh Securities, Inc. having knowledge about the following subjects:
  - (a) The knowledge of Elizabeth Ann DeMola of the existence of any frauds with respect to any residential mortgages assigned by National Home Funding to plaintiff;
  - (b) The involvement of Elizabeth Ann DeMola in any frauds with respect to any mortgages assigned by National Home Funding to plaintiff;
  - (c) The knowledge of Elizabeth Ann DeMola with respect to any frauds concerning any mortgages assigned by any party to plaintiff Walsh Securities;
  - (d) The involvement of Elizabeth Ann DeMola with respect to any frauds concerning any mortgages assigned by any party to plaintiff Walsh Securities;
  - (e) The job titles and job descriptions of Elizabeth Ann DeMola with Walsh Securities, Inc.;

- (f) The knowledge of James Walsh of the existence of any frauds with respect to any residential mortgages assigned by National Home Funding to plaintiff;
- (g) The involvement of James Walsh in any frauds with respect to any mortgages assigned by National Home Funding to plaintiff;
- (h) The knowledge of James Walsh with respect to any frauds concerning any mortgages assigned by any party to plaintiff Walsh Securities;
- (i) The involvement of James Walsh with respect to any frauds concerning any mortgages assigned by any party to plaintiff Walsh Securities;
- (j) The job titles and job descriptions of James Walsh with Walsh Securities, Inc.;
- (k) The knowledge of Robert Walsh of the existence of any frauds with respect to any residential mortgages assigned by National Home Funding to plaintiff;
- (l) The involvement of Robert Walsh in any frauds with respect to any mortgages assigned by National Home Funding to plaintiff;
- (m) The knowledge of Robert Walsh with respect to any frauds concerning any mortgages assigned by any party to plaintiff Walsh Securities;
- (n) The involvement of Robert Walsh with respect to any frauds concerning any mortgages assigned by any party to plaintiff Walsh Securities;
- (o) The involvement of any employee of Walsh Securities, Inc. in any frauds with respect to any mortgages assigned by National Home Funding to plaintiff Walsh Securities;
- (p) The knowledge of any employee of Walsh Securities, Inc. with respect to any frauds concerning any mortgages assigned by any party to plaintiff Walsh Securities;

- (q) The Cityscape Corp. v. Walsh Securities, Inc. (S.D.N.Y. 98 Civ. 0223 (SHS)) lawsuit, including but not limited to the allegations of any party, the defenses of Walsh, the discovery and any testimony given by any party or witness;
- (r) The job titles and job descriptions of Robert Walsh with Walsh Securities, Inc.;
- (s) The identity of the shareholders of Walsh Securities, Inc. at any time;
- (t) The acquisition of plaintiff by Resource Bank Shares, including but not limited to any negotiations with Resource Bank Shares and the reason why the Resource Bank Shares acquisition was not completed;
- (u) The underwriting standards of the plaintiff from 1994-1997;
- (v) The way that plaintiff kept track or tracked the acquisition of mortgages, including but not limited to whether plaintiff was aware, or could have been aware, of individuals applying for more than one mortgage;
- (w) Any and all efforts made by the plaintiff to mitigate its damages in this case;
- (x) The basis for any damage claims of the plaintiff in this case;
- (y) The allegations contained in any Complaint and/or Amended Complaint filed in this case by the plaintiff;
- (z) The involvement of defendant National Home Funding in any frauds alleged by the plaintiff in the Complaint;
- (aa) The involvement of Robert Skowrenski, II, in any frauds alleged by the plaintiff in the Complaint;

- (bb) The knowledge of Robert Skowrenski, II, with respect to any frauds alleged by the plaintiff in the Complaint;
- (cc) The involvement of any employee of National Home Funding with respect to any frauds alleged by the plaintiff in the Complaint;
- (dd) The knowledge of any employee of National Home Funding with respect to any frauds alleged by the plaintiff in the Complaint; and
- (ee) Any issues relevant to liability or damages.

McCARTER & ENGLISH, LLP  
Attorneys for Defendant/Third-Party  
Plaintiff Commonwealth Land Title  
Insurance Company

By:

David R. Kott  
A Member of the Firm

Dated: